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Superior Court of California  
County of Los Angeles

OCT 30 2015

Sherri R. Carter, Executive Officer/Clerk  
By Cristina Grijalva, Deputy

Attorneys for Plaintiff

**NO FEE – GOV'T CODE § 6103**

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

BC 599520

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	CASE NO.
ex rel. MICHAEL N. FEUER, City Attorney of the	)	
City of Los Angeles,	)	<b>COMPLAINT TO ABATE, PREVENT,</b>
	)	<b>AND ENJOIN A NUISANCE UNDER</b>
Plaintiff,	)	<b>PENAL CODE SECTIONS 11225, ET</b>
	)	<b>SEQ. AND FOR VIOLATIONS OF</b>
vs.	)	<b>CALIFORNIA BUSINESS &amp;</b>
	)	<b>PROFESSIONS CODE SECTIONS 17200,</b>
SUE HEE LEE (also known as SUE H. LEE),	)	<b>ET SEQ.</b>
individually and doing business as STAR	)	
HOLISTIC SPA CO. and/or STAR HOLISTIC SPA;	)	(Unlimited Action)
2551 BEVERLY LLC, a California Limited Liability	)	
Company; and DOES 1 through 100, inclusive,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows, which  
allegations are upon information and belief insofar as they pertain to the conduct of Defendants:

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## INTRODUCTION

1. This action is brought and prosecuted by the People of the State of California ("People") for the purpose of enjoining, abating and preventing a nuisance as defined in Penal Code sections 11225, et seq. (the "Red Light Abatement Law"), which exists on the premises located at 2551 Beverly Boulevard, Los Angeles, California 90057 (the "Property"). A business functioning as a massage parlor, commonly known as "Stars Holistic Spa Co." and/or "Stars Holistic Spa" (referred to as the "Massage Business"), is located on the Property. Sue Hee Lee (also known as Sue H. Lee) owns and/or operates the Massage Business, along with Does 1-50 ("Business Owner Defendants"). 2551 Beverly LLC and Does 51-100 ("Property Owner Defendants") are the owners of the Property.

2. Defendants have directly or indirectly conducted, maintained or permitted the Property to be used, from an exact date unknown, but at least since August 2013, for the purposes of prostitution. In addition, the People seek to enjoin Defendants' violations of the Unfair Competition Law (Business and Profession Code sections 17200, et seq.) through this action. The People assert their power to remedy these injuries to the public interest by seeking to enjoin Defendants' future violations of law and to assess civil penalties against Defendants for past violations of law.

## GENERAL ALLEGATIONS

### The Parties

3. Plaintiff is the People of the State of California, acting through the Los Angeles City Attorney, Michael N. Feuer, who brings this action pursuant to the authority granted to him by Penal Code section 11226 and Business and Professions Code section 17204.

4. At all relevant times, 2551 Beverly Boulevard, Los Angeles, California 90057, with the legal description of: Lots 77, 78 79 and 8 of Upper Rampart Heights, City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 9, Page 114 of Maps, in the office of the county recorder of said county. Also Known as: 2551 Beverly Blvd., Los Angeles, CA 90057 AP# [Assessor's Parcel Number]: 5157-001-019" (the real property is hereinafter referred to as the "Property"), was and is real property located at 2551 Beverly Boulevard, Los Angeles, California 90057.

5. At all relevant times, 2551 Beverly LLC ("Property Owner Defendant"), was and is the owner of the Property, and at all relevant times mentioned herein have acted in such a capacity.

1           6.       Since at least August 2013, a business known as "Stars Holistic Spa Co" and/or "Stars  
2 Holistic Spa" has been operating at the Property.

3           7.       At all relevant times and since at least August 2013, Defendant Sue Hee Lee (also known  
4 as Sue H. Lee) is and has been the owner and/or operator of "Stars Holistic Spa Co" and/or "Stars  
5 Holistic Spa" (referred to as the "Massage Business") on the Property, and at all relevant times  
6 mentioned herein has acted in such a capacity.

7           8.       Defendants 2551 Beverly LLC and Sue Hee Lee (also known as Sue H. Lee), are, and at  
8 all relevant times mentioned herein were, the owners of the Property and/or the owners/operators of the  
9 Massage Business and each of them, lease, own, possess, control, maintain, operate, manage or  
10 supervise the Massage Business.

11          9.       Plaintiff is ignorant of the true names and capacities of Defendants Does 1 through 100,  
12 inclusive, and as such, sues these defendants by such fictitious names pursuant to Section 474 of the  
13 California Code of Civil Procedure. Each such defendant is responsible in some manner for conducting,  
14 maintaining, or directly or indirectly permitting the unlawful activity complained of herein. When the  
15 true names and capacities of said defendants have been ascertained, Plaintiff will ask leave of the court  
16 to amend this complaint and to insert in lieu of such fictitious names the true names and capacities of  
17 any fictitiously named defendants.

18          10.      At all relevant times mentioned herein, all defendants were and are agents, lessors,  
19 lessees, servants, employees, partners and/or joint venturers of each other defendant, and at all times  
20 were acting within the course and scope of said relationship and with the consent of each of their co-  
21 defendants.

22          11.      At all times mentioned herein, the City of Los Angeles, was and still is a municipal  
23 corporation with a population in excess of 750,000 people, organized and existing under the laws of the  
24 State of California for purposes of Business and Professions Code section 17204.

25                               **Jurisdiction and Venue**

26          12.      Each of the business acts and practices alleged herein were performed by Defendants, in  
27 whole or in part, in the City of Los Angeles.

28          13.      The Property that is the subject of this action is located in the City of Los Angeles.

**FIRST CAUSE OF ACTION**  
**FOR VIOLATION OF THE RED LIGHT ABATEMENT LAW**  
**(For Red Light Abatement Nuisance — Penal Code section 11225 et seq.**  
**Against All Defendants and DOES 1 through 100)**

14. The People incorporate paragraphs 1 through 13, above, as if fully realleged herein.

15. This action is brought and prosecuted for the purpose of enjoining and abating a red light nuisance, as defined in California Penal Code section 11225, et seq., which exists at 2551 Beverly Boulevard, Los Angeles, California 90057.

16. Defendants have directly or indirectly conducted, maintained or permitted the Property to be used, from an exact date unknown but at least since August 2013, for the purposes of prostitution and prostitution-related activities.

17. Since at least August 2013, the Massage Business at the Property is a place where acts of prostitution and prostitution-related activities are held or occur.

18. Since at least August 2013, LAPD officers have conducted numerous undercover vice investigations that resulted in the arrests of several individuals for prostitution and prostitution-related crimes at the Massage Business on the Property.

19. The Massage Business is a nuisance per se because of the ongoing and continuous prostitution activities occurring there since at least August 2013, and must therefore be abated pursuant to the Red Light Abatement Law.

20. From August 2013 to the present, Defendants and DOES 1 to 100, and each of them, violated the Red Light Abatement Law by maintaining or permitting, directly or indirectly, nuisance prostitution acts to occur and/or by failing to abate or prevent nuisance prostitution acts from occurring at the Massage Business and/or the Property.

21. The Property has a reputation in the community as a location where prostitution takes place.

22. The activity set forth in paragraphs 1 through 21 has been a continuous and ongoing prostitution nuisance, under Penal Code sections 11225 et seq., upon the Property for more than one year.

23. Defendants and DOES 1 to 100, and each of them, violated the Red Light Abatement Law by maintaining or permitting, directly or indirectly, nuisance prostitution acts to occur and/or by failing to abate or prevent nuisance prostitution acts from occurring at the Massage Business and/or the Property as described in paragraphs 1 through 22. Therefore, the nuisance existing at the Property must be abated and prevented in accordance with Penal Code sections 11225-11235.

24. Plaintiff has no adequate remedy at law, and unless Defendants and each of them are enjoined and restrained by order of the Court, they will continue to directly or indirectly maintain or permit the nuisance prostitution acts to occur at the Massage Business and/or the Property to the irreparable damage of the community and in violation of the law. The People have no plain, speedy, or adequate remedy at law, and so request the injunctive relief that is expressly provided by Penal Code sections 11225-11231.

## SECOND CAUSE OF ACTION

**(For Unlawful Business Practices—**

**Business and Professions Code Section 17200 et seq. —**

**Against All Defendants and DOES 1-100)**

25. Plaintiff incorporates herein by reference paragraphs 1 through 24 of this Complaint, as though fully set forth herein.

26. The practices prohibited by Business and Professions Code section 17200 (“Unfair Competition Law” or “UCL”) are “any practices forbidden by law, be it civil or criminal, federal, state, or municipal, statutory, regulatory, or court-made. It is not necessary that the predicate law provide for private civil enforcement. As [the] California Supreme Court put it, section 17200 ‘borrows’ violations of other laws and treats them as unlawful practices independently actionable under section 17200 et seq.” (*South Bay Chevrolet v. General Motors Acceptance Corp.* (1999) 72 Cal. App. 4th 861, 880 [internal citations and quotation marks omitted].)

27. The City of Los Angeles has a population in excess of 750,000 and the City Attorney for the City of Los Angeles brings the second cause of action alleged herein on behalf of the People, pursuant to Business and Professions Code section 17204, which provides that an action under Chapter 5 of Division 7 of the Business and Professions Code may be brought in the name of the People of the

1 State of California by any city attorney of a city, or city and county, having a population in excess of  
2 750,000.

3 28. Since at least August 2013 to the present, Defendants and DOES 1 to 100, and each of  
4 them, violated the UCL by engaging in the following unlawful business acts and practices:

5 A. Directly or indirectly maintaining or permitting nuisance prostitution acts and  
6 prostitution-related activities to occur at the Property in violation of Penal Code section 11225 et seq.,

7 B. Failing to abate or prevent nuisance prostitution acts from occurring at the Property in  
8 violation of Penal Code section 11225 et seq.,

9 29. Defendants' acts of unlawful business practices under the UCL present a continuing  
10 threat to the public's health, safety, and welfare. The People have no adequate remedy at law, and unless  
11 Defendants are permanently enjoined and restrained by order of the Court, they will continue to commit  
12 acts of unfair competition, and thereby continue to cause irreparable harm to the public's health, safety,  
13 and welfare.

14 **PRAYER**

15  
16 WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND  
17 DECREE AS FOLLOWS:

18 **AS TO THE FIRST CAUSE OF ACTION**

19 1. Defendants, and each of them, and the Property, including all buildings and structures  
20 thereon, be declared in violation of Penal Code section 11225, et seq.

21 2. That the Property, together with the fixtures and movable property therein and thereon,  
22 be declared a nuisance and be permanently abated as such in accordance with Penal Code section 11230.

23 3. That the Court grant preliminary and permanent injunctions in accordance with Penal  
24 Code section 11225 et seq., enjoining and restraining Defendants, and each of them, their agents,  
25 officers, employees and anyone acting on their behalf, from conducting, permitting, maintaining, either  
26 directly or indirectly, the use of the Property as a public nuisance.

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1           4.       That as part of the Judgment, an Order of Abatement be Issued, and that the Property be  
2 closed for a period of one year, not to be used for any purpose, and be under the control and custody of  
3 this Court for said period of time.

4           5.       That all fixtures and moveable property used in conducting, maintaining, and/or  
5 permitting the nuisance at the Property be removed by LAPD and sold in the manner provided for the  
6 sale of chattels under execution. Said fixtures and property shall be inventoried and a list prepared and  
7 filed with this Court.

8           6.       There shall be excepted from said sale such property to which title is established in some  
9 third party not a defendant, nor agent, officer, employee or servant of any Defendant in this proceeding.  
10 That the proceeds from said sale be deposited with this Court for payment of the fees and costs of sale.

11           7.       Such costs as may occur in closing said Property and keeping it closed, removal of said  
12 property, and such other costs as the Court shall deem proper.

13           8.       If the proceeds of the sale do not fully discharge all such costs, fees and allowances, the  
14 Property shall also be sold under execution issued upon the order of the Court or judge and the proceeds  
15 of such sale shall be applied in a like manner.

16           9.       Any excess monies remaining after payment of approved costs shall be delivered to the  
17 owner of said Property. Ownership shall be established to the satisfaction of this Court.

18           10.      That the Defendants be required to obtain the Court's prior approval before transferring,  
19 conveying, or encumbering, for consideration or otherwise, any portion of the Property.

20           11.      That the Defendants be ordered to immediately notify any transferees, purchasers,  
21 commercial lessees, or other successors in interest to the subject Property of the existence and  
22 application of any temporary restraining order, preliminary injunction, or permanent injunction to all  
23 prospective transferees, purchasers, commercial lessees, or other successors in interest, before entering  
24 into any agreement to sell, lease or transfer the Property for consideration or otherwise, all or any  
25 portion of the Property that is the subject of this action.

26           12.      That the Defendants be ordered to immediately give a complete, legible copy of any  
27 temporary restraining order and preliminary and permanent injunctions to all prospective transferees,  
28 purchasers, commercial lessees, or other successors in interest to the subject Property.

1           13.     That the Defendants be ordered to immediately request and procure signatures from all  
2 prospective transferees, purchasers, commercial lessees, or other successors in interest to the subject  
3 Property, which acknowledges his/her respective receipt of a complete, legible copy of any temporary  
4 restraining order, preliminary and permanent injunction, and deliver a copy of such acknowledgment to  
5 the Los Angeles City Attorney's Office, c/o Deputy City Attorney Maria Aguillon.

6           14.     That Plaintiff recover the costs of this action, including LAPD investigative costs and  
7 attorneys' fees pursuant to California Civil Code section 3496(b).

8           15.     That Plaintiff recover the amount of filing fees and the amount of fee for service of  
9 process or notices which would have been paid but for Government Code section 6103.5.

10          16.     That Defendants, and each of them, be assessed a civil penalty in an amount not to  
11 exceed twenty-five thousand dollars (\$25,000.00).

12 AS TO THE SECOND CAUSE OF ACTION

13          17.     That Defendants and their agents, officers, employees and anyone acting on their behalf  
14 be declared in violation of Business and Professions Code section 17200 et seq.

15          18.     That Defendants and their agents, officers, employees and anyone acting on their behalf  
16 be permanently enjoined from maintaining, operating, or permitting any unfair or unlawful business act  
17 or practice in violation of Business and Professions Code sections 17200 et seq.

18          19.     That the Court grant a preliminary and permanent injunction prohibiting Defendants and  
19 their agents, officers, employees and anyone acting on his behalf from engaging in the unfair or  
20 unlawful business act or practice in violation of Business and Professions Code sections 17200 et seq. as  
21 herein described on the Property and ordering that the conditions and activities, as herein described, be  
22 corrected and eliminated within the City of Los Angeles.

23          20.     That pursuant to Business and Professions Code sections 17200 et seq., Defendants and  
24 their agents, officers, employees and anyone acting on his behalf be assessed a civil penalty of Two  
25 Thousand Five Hundred Dollars (\$2,500.00), for each and every act of unfair and unlawful competition,  
26 and every day that the Property has been maintained as a nuisance, including and not limited to  
27 violations of section 11225, et seq. of the Penal Code, the Red Light Abatement Act.

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1           ON ALL CAUSES OF ACTION

2           21.     That Plaintiff be granted such other and further relief as the Court deems just and proper.

3  
4           DATED: October 30, 2015

Respectfully submitted,  
MICHAEL N. FEUER, City Attorney  
ASHA GREENBERG, Managing Assistant City Attorney  
ANH TRUONG, Asst. Superv. Deputy City Attorney

7  
8           By: \_\_\_\_\_

Maria Agillon  
MARIA AGUILLON, Deputy City Attorney  
Attorneys for Plaintiff, THE PEOPLE OF THE STATE  
OF CALIFORNIA